

SFUND RECORDS CTR  
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**Cox, Castle & Nicholson LLP**  
2029 Century Park East, Suite 2100  
Los Angeles, California 90067-3284  
P: 310.284.2200 F: 310.284.2100

Erin K. Phalon  
310.284.2186  
ephalon@coxcastle.com

April 19, 2019

File No. 069145

**VIA OVERNIGHT DELIVERY**

Kim Muratore, Case Developer (SFD0705)  
U.S. EPA, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

Re: CERCLA Section 104(e) Information Request Letter  
Orange County North Basin Study Area, Orange County, CA  
311 South Highland Avenue, Fullerton, CA ("Property")

Dear Ms. Muratore:

Enclosed please find the response of Fullerton Manufacturing Company ("Company") to the CERCLA Section 104(e) Information Request Letter regarding the Property. Please note that although the Request for Information is extremely broad in scope, Company has made a good faith effort to provide complete answers to the extent possible. Company reserves the right to augment and supplement its responses in the future. Also enclosed is a USB drive containing responsive documents.

Please be advised that Company is investigating the environmental condition of the Property under the oversight of the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB"). The Company is currently implementing a Work Plan for Vapor Intrusion Investigation which was approved by the RWQCB on January 16, 2019. The scope of work includes research of potential onsite sources of trichloroethene (TCE), performance of a two-day soil vapor survey to assess the presence of volatile organic compounds (VOCs), and indoor and outdoor air sampling for VOCs.

Please contact me with any questions or concerns regarding the enclosed response or the ongoing investigation of the Property.

Very truly yours,

A handwritten signature in blue ink that reads "Erin Phalon".

Erin K. Phalon

Encls.

cc: Victoria Wallin  
Kathleen Aisling  
Bethany Dreyfus

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## **Response to Request for Information**

### **GENERAL OBJECTIONS**

1. Fullerton Manufacturing Company ("Company") objects generally to each request to the extent it seeks to elicit information and documents subject to and protected by the attorney-client privilege and/or the attorney work product protection or any other applicable privilege, protection, immunity, or doctrine. Company intends to and does claim privilege with respect to all such information and documents. Nothing contained herein is intended to be nor should be construed as a waiver of the attorney-client privilege, the attorney work product protection, the right to privacy, or any other applicable privilege, protection, immunity, or doctrine.

2. Company objects to these requests to the extent they seek information prohibited and/or restricted from disclosure by agreement, law or regulation.

3. Company objects to these requests to the extent they seek information from entities other than Company. Company responds to these requests on behalf of Company only.

4. Company objects to these requests to the extent that they exceed EPA authority.

5. Company objects to these requests, and to each and every individual request contained therein, to the extent that they call for information or documents not within Company's possession, custody, or control. These responses are based upon information reasonably available to Company and documents and information within Company's possession, custody or control. Company further objects that obtaining documents or information within the possession of third parties is unreasonably burdensome, harassing, and unreasonable.

6. Company objects to these requests, and to each and every individual request contained therein, as overly broad, unduly burdensome and oppressive to the extent they fail to specify any relevant time period, and thus are neither limited to events relevant to this request nor reasonably calculated to lead to the production of material relevant to this request.

7. Company objects to the requests to the extent they seek information or documents already in the possession of EPA, or in the public domain and as readily available to EPA as to Company.

8. Company objects to these requests to the extent that they seek duplicative and/or cumulative information or documents.

9. Company objects to these requests to the extent that they require a continuing production obligation.



10. Company objects to these requests to the extent that they fail to define unclear terms. Company used best effort to reasonably interpret terms in the absence of specific definitions in a manner consistent with internal practices and industry standards.

11. These objections shall be deemed to be incorporated in full into each response set forth below, and any statement of intent to produce information or documents contained in any such response is subject to the limitations, objections and exceptions set forth herein. Moreover, any statement of intent to produce information or documents responsive to a particular request is not, and shall not be deemed, a representation that any such information or documents exist or are in the possession, custody or control of Company.

### RESPONSES

- 1) State the full legal name, address, telephone number, position(s) held by, and tenure of the individual(s) answering any of the questions below on behalf of Fullerton Manufacturing Company ("Company").

Victoria L. Wallin  
President  
Fullerton Manufacturing Company  
74 William Street  
Worcester, MA 01609

Alejandro Fuan  
Project Manager  
The Reynolds Group  
(714) 730-5397 office  
P.O. Box 1996,  
Tustin, CA 92780-1996

- 2) Identify the dates the Company, under any of its current or former business structures, owned and/or operated the facility located at 311 South Highland Avenue, Fullerton California (the "Facility").

Company acquired the Facility in 1978 and operated at the Facility from approximately 1978 to 1989.

- 3) Identify all individuals who are or were responsible for environmental matters at the Facility during its operation at this address. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates each individual held such position.

Company's Environmental Consultant:  
Alejandro Fuan  
Project Manager  
The Reynolds Group



(714) 730-5397 office  
P.O. Box 1996,  
Tustin, CA 92780-1996

Company's Operations Contact:  
Victoria L. Wallin  
President  
Fullerton Manufacturing Company  
(617) 435-5758  
74 William Street  
Worcester, MA 01609

Please note that Company does not possess information regarding other individuals who may have been responsible for environmental matters at the Facility.

- 4) Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the creation, use, storage, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate. This includes individuals whose job functions included operations that utilized or generated these hazardous substances, or who were responsible for storing/filling/ disposing of hazardous substances and/or wastes containing the above-identified chemicals. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position title, and the dates the individual held such position. Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates.

Company has no knowledge of the creation, use, storage, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate.

- 5) Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the physical layout of each operational area of the Facility, who could explain the day-to-day flow of the operations, or who know the location of physical features such as clarifiers, degreasers, and above- and below- ground storage tanks. For each individual, provide his/her full name, current or last known address, current or last known telephone number, position title, and the dates the individual held such position. Provide a copy of the articles of incorporation, partnership agreement, articles of organization, or any other documentation (together with any amendments) demonstrating the particular business structure under which the Company has existed or operated since its inception.

Company does not operate the Facility. However, Company operated at the Facility from approximately 1978 to 1989.

Company's Operations Contact:



Victoria L. Wallin  
President  
Fullerton Manufacturing Company  
(617) 435-5758  
74 William Street  
Worcester, MA 01609

- 6) Explain the Company's present corporate status (e.g., active, suspended, defunct, merged, dissolved) as well as its operational status (e.g., whether and where business operations are currently occurring).

Company is active. Company's holdings consist solely of the Facility, which Company leases. Manufacturing operations ceased in 1989.

- 7) Provide the date and in which State the Company was incorporated, formed, or organized.

Company was formed on May 6, 1946 in California.

- 8) Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates, and identify each business structure under which it existed or operated while at the Facility location. For each business structure and name under which the Company has existed or operated at the Facility, provide the corresponding dates that it existed or operated under that business structure and name.

Company is, and always has been, a corporation.

- 9) If the Company operated at the Facility as a subsidiary, division, or other business unit, provide this information and identify where it fits into the larger company's structural organization.

Company operated at the Facility from approximately 1978 to 1989.

- 10) If the Company is now using or has ever used a fictitious business name while operating at the Facility, identify the fictitious names and the owners of each fictitious name.

Not applicable (N/A).

- 11) If the Company sold the Facility property, provide the date on which the Facility property was sold and the person or entity to whom it was sold. To the extent known, indicate whether you understand whether the buyer planned to continue the same or similar business operations at the Facility as that conducted by the Company. To the extent you are aware, include any information regarding changes planned by the buyer regarding operations that involve the use, storage,



or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate (e.g., plans to add or dismantle clarifiers, change the types of solvents being used).

N/A.

- 12) If the Facility was operated by other parties prior to the Company's operations, identify the prior operators and describe those previous operations to the extent known. Describe any changes made to operations by the Company after it began operating at the Facility that changed (either increases or decreases) the use or disposal of PCE, TCE, 1,1-DCE; 1,1,1-TCA, 1,4-dioxane, or perchlorate.

Company operated at the Facility from approximately 1978 to 1989.

The site was reportedly initially developed in 1927 as a warehouse. From 1927 to 1955, a cannery, metal-forming and metal manufacturing operations were conducted. The current building located at the Facility was reportedly constructed in 1955. From 1955 to 1970, the site was used to manufacture kit trailers and aircraft-related parts, including as a former Hughes Aircraft Company facility. From 1973 to 1992, the site was used to manufacture molded rubber products. Company acquired the site in 1978. The site was used as a warehouse/office by a footwear retailer, Shoe City, from 1992 until the early 2000s.

OEM Press Systems has occupied the site since approximately 2003. OEM designs and manufactures hydraulic press and automated material handling systems for the electronic, composites, plastics, and rubber industries. At the Site, OEM receives all parts of their manufactured hydraulic presses, and performs assembly (including cutting and painting) and final testing of their hydraulic presses. Research and development (R&D) is also performed at the Site. Chemicals used by OEM at the Site include cutting/cooling fluids for metal cutting with their computer numeric control (CNC) machines, hydraulic oil for their presses, acetone for degreasing and parts cleaning, and paints. Cutting/cooling fluids, hydraulic oil, and acetone are stored in drums, and paints are stored in cans placed in metal lockers. All chemicals are stored on the western end of the OEM unit.

In 2001, Ventec Global Laminates USA began operating in the western quarter of the site building. Ventec distributes copper-clad laminates manufactured in their plants in Asia for printed circuit boards. Ventec does not perform manufacturing at the site and only performs storage, cutting, drilling, and laminating for distribution.

No information was identified regarding prior operators' use or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane or perchlorate.

- 13) For any period of time in which the Company owned the Facility under any of its current or former business structures and leased the Facility, provide the name, address, and phone number of any tenants and/or lessees.



Current Occupants: OEM Press Systems, John B. Copp (deceased); OEM, LLC, Sean Field, 311 S. Highland, Fullerton, CA 714-449-7500; Ventec, Jack Pattie, 311 S. Highland, Fullerton, CA, 978-265-0734.

Previous owners/occupants: Mid-Cal Rubber Company, Dennis Bergdorf; Dan-Van Rubber, Inc; JBD Holding Co.; Autonetix, a division of North American Aviation; Hughes Aircraft; Trama Homes, Inc; Daystrom Balboa Corp.; H.B.P. Co.; Kohl Forming Co.; The Toyad Co.; California Pea Products, Inc.; Cutler-Lobinger Packing Co.'s Vegetable Cannery.

- 14) For any period of time in which the Company under any of its current or former business structures operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner and/or lessor.

Company did not operate at the Facility prior to its ownership of the Facility.

- 15) Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and any products manufactured or services performed at the Facility. Describe any significant change in Facility size, the Company's number of employees, and the products manufactured or services performed over time.

Company employs zero employees at the Facility. The site encompasses approximately 2.1 acres (approximately 595 feet by 151 feet). A single-story industrial building covers approximately 38,000 square feet (360 feet by 105 feet). The site was reportedly initially developed in 1927 as a warehouse. From 1927 to 1955, a cannery, metal-forming and metal manufacturing operations were conducted. From 1955 to 1970, the site was used to manufacture kit trailers and aircraft-related parts, including as a former Hughes Aircraft Company facility. From 1973 to 1992, the site was used to manufacture molded rubber products. Company acquired the site in 1978. The site was used as a warehouse/office by a footwear retailer from 1992 until the early 2000s.

OEM Press Systems has occupied the site since approximately 2003. In approximately 2014, following the death of OEM Press Systems' Founder and Chief Executive Officer, OEM Press Systems was sold. The current tenant formed OEM, LLC. OEM designs and manufactures hydraulic press and automated material handling systems for the electronic, composites, plastics, and rubber industries. At the Site, OEM receives all parts of their manufactured hydraulic presses, and performs assembly (including cutting and painting) and final testing of their hydraulic presses. Research and development (R&D) is also performed at the Site. Chemicals used by OEM at the Site include cutting/cooling fluids for metal cutting with their computer numeric control (CNC) machines, hydraulic oil for their presses, acetone for degreasing and parts cleaning, and paints. Cutting/cooling fluids, hydraulic oil, and acetone are stored in drums, and paints are stored in cans placed in metal lockers. All chemicals are stored on the western end of the OEM unit.



In 2001, Ventec Global Laminates USA began operating in the western quarter of the site building. Ventec distributes copper-clad laminates manufactured in their plants in Asia for printed circuit boards. Ventec does not perform manufacturing at the site and only performs storage, cutting, drilling, and laminating for distribution.

- 16) Provide a map of the Facility showing the locations of buildings and significant features on the property at the time that the Company operated at the Facility. Indicate the locations of any maintenance shops, machine shops, degreasers, clarifiers, plating areas, painting areas, cooling towers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:

A Site Plan that shows the features that existed during Fullerton Manufacturing Company's operations, approximately from 1978 and 1989, is provided in Item 16 of the enclosed USB drive. The Site is located on the southwest corner of S. Highland Avenue and W. Walnut Avenue in the City of Fullerton and encompasses a rectangular area of 2.1 acres (approximately 595 feet by 151 feet). A single-story tilt-up industrial building covers approximately 38,000 square feet (360 feet by 105 feet) and is centered on the southern boundary of the Site. The lot surface outside the building is comprised of asphalt. The Site vicinity includes both commercial/industrial and residential properties and lies between a main line rail road (north) and a former railroad right-of-way (south). The former railroad right-of-way to the south is currently owned by the City of Fullerton (APN #032-171-37) and consists of a vacant unpaved lot.

- a. Surface structures (e.g., buildings, tanks, containment areas, storage areas);

A single-story tilt-up industrial building covers approximately 38,000 square feet (360 feet by 105 feet) and is centered on the southern boundary of the Facility.

- b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers);
- c. Stormwater drainage system and sanitary sewer system, including septic tanks and subsurface disposal fields;
- d. Any and all additions, demolitions, or changes of any kind to physical structures on, under, or about the Facility or to the property itself (e.g., excavation work) and the dates on which such changes occurred; and

The Site was initially developed in approximately 1927 as a warehouse building. From 1927 to 1955, a cannery and metal-forming and metal manufacturing operations were conducted at the Facility.

- e. The location of all waste storage or waste accumulation areas as well as waste disposal areas (e.g., dumps, leach fields, burn pits).



- 17) Indicate on a map of the Facility or in narrative form each location where any of the following chemicals were used, stored, generated, spilled, or disposed of: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate. Describe any manufacturing or treatment processes in which any of these chemicals were used.

Not applicable. Company is not aware of the use, storage, generation, spill, or disposal of: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

- 18) Provide copies, both originals and updates, of hazardous material business plans and chemical inventory forms submitted to city, county, and/or state agencies for the Facility.

Please see documents provided in Item 18 of the enclosed USB drive.

- 19) Provide a list of all chemicals and hazardous substances used at the Facility that contained any of the following: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

Not applicable. Company is not aware of the use of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

- 20) For any PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate used at or transported to or from the Facility, identify and provide the following information:

Not applicable. Company is not aware of the use of: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

- a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance;
- b. The locations where each chemical or hazardous substance is or was used, stored, and disposed of;
- c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
- d. The quantity purchased (in gallons) and the time period during which it was used; and
- e. Copies of Material Safety Data Sheets for all hazardous substances used that contain any of these chemicals.

- 21) Provide copies of all investigation and sampling reports containing environmental data or technical or analytical information regarding soil, water, and air conditions at the Facility, including, but not limited to, data or information related to soil



contamination, soil sampling, soil gas sampling, indoor air sampling, geology, groundwater, surface water, and hydrogeology.

- a. State whether the information provided represent a complete list of all soil, soil gas, indoor air, and groundwater sampling conducted at the Facility. If you are aware of any other investigations or sampling reports for which the Company does not have a copy, describe the date and type of sampling conducted, and provide information on where EPA might obtain the report and related documents.

Historical reports are on the enclosed USB drive.

- b. State whether the Company is aware of any planned future soil, soil gas, indoor air, or groundwater sampling at the Facility, and if so, please describe.

Company is implementing an RWQCB-approved Workplan for Soil Vapor Investigation consisting of soil vapor sampling and, if necessary based on soil vapor sampling results, indoor air sampling.

- 22) Identify and provide copies of all agency orders, correspondence, and/or workplans regarding any soil, soil gas, indoor air, and/or groundwater sampling at the Facility that was ordered or agreed to be performed, but that was never completed. Explain, to the best of your ability, why the sampling was not conducted.

Not applicable. To the best of our knowledge, all required assessments have been completed.

- 23) Provide copies of any due diligence reports or property transfer assessments related to the Facility.

The 1993 Phase I Environmental Site Assessment performed by ETS is on the enclosed USB drive. Please note that Company does not possess any property transfer assessments.

- 24) Identify, and provide the following information for, all groundwater wells located at the Facility:

- a. A map with the specific locations of the groundwater wells;

See Item 24 of the enclosed USB drive.

- b. Dates of well construction;

See Item 24 of the enclosed USB drive.



- c. Depth to groundwater, depth of well, and depth to and of screened intervals;  
  
See Item 24 of the enclosed USB drive.
  - d. Uses of each well;  
  
See Item 24 of the enclosed USB drive.
  - e. Date each well was abandoned, if applicable;  
  
Not applicable. Wells have not been abandoned.
  - f. Date each well was sampled;  
  
See Item 24 of the enclosed USB drive.
  - g. All constituents analyzed for during groundwater sampling events; and  
  
See enclosed USB drive.
  - h. All groundwater sampling results, reports of findings, and analytical data.  
  
See enclosed USB drive.
- 25) Provide copies of any applications for permits or permits received for the Facility under any local, state, or federal environmental laws and regulations, including any waste discharge permits (e.g., national pollutant discharge elimination system [NPDES] permits).
- Copies of all permits issues by the City of Fullerton Building Department and Fire Department are provided in Item 25 of the enclosed USB drive.
- 26) For each waste stream generated at the Facility, identify the waste and describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.
- 27) If the Company discharged any of its waste stream at the Facility to the sewer, identify all locations where waste streams were discharged and provide copies of all permits and all analyses performed on discharged water.
- 28) Describe the method(s) used by the Company to remove waste streams from sumps at the Facility.
- 29) Identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. Identify and provide supporting documentation of:

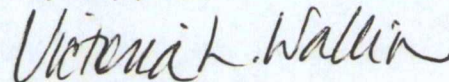


Not applicable. Company is unaware of leaks, spills or other releases associated with operations at the Property.

- a. The date each release occurred;
  - b. The cause of each release;
  - c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
  - d. Where each release occurred and what areas were impacted by the release; and
  - e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.
- 30) Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.

Not applicable. There is no known correspondence between Company and local, state, or federal authorities concerning the use, handling, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate at the Facility.

Very truly yours,



Victoria L. Wallin

Fullerton Manufacturing Company